

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
Development of Operational, Technical and)	WT Docket No. 96-86
Spectrum Requirements for Meeting Federal,)	
State and Local Public Safety)	
Communications Requirements Through the)	
Year 2010)	
)	
Service Rules for the 698-746, 747-762)	WT Docket No. 06-150
and 777-792 MHz Bands)	
)	
Former Nextel Communications, Inc.)	WT Docket No. 06-169
Upper 700 MHz Guard Band)	
Licenses and Revisions to Part 27 of)	
the Commission's Rules)	
)	
Implementing a Nationwide,)	PS Docket No. 06-229
Broadband, Interoperable Public)	
Safety Network in the 700 MHz)	
Band)	

COMMENTS OF THE CITY OF FORT LAUDERDALE, FLORIDA

The City of Fort Lauderdale, Florida hereby submits these comments in response to the Commission's *Further Notice of Proposed Rulemaking* in the above captioned proceedings released on April 27, 2007. The City is dedicated to promoting effective management and efficient use of the 700 MHz public safety spectrum allocations assigned by the Commission a decade ago to meet our local and regional public safety needs.

The Miami-Fort Lauderdale area is activity planning for broadband data systems that will cover our respective urban areas. The necessity of having control of the available spectrum as set forth in WT Docket 96-86 is critical.

Therefore;

The City of Fort Lauderdale agrees with the numerous public safety entities that have gone on record supporting the concept of a nationwide, interoperable broadband network. At the same time, we also agree with the many same public safety entities that filed Comments and Reply Comments in the previous NPRMs of the above WT Docket 96-86 supporting the need for public safety agencies to have the flexibility to choose the solution best meeting their needs, whether that solution is broadband or wideband technology. The City of Fort Lauderdale disagrees with the tentative conclusion by the Commission, as published in the FNPRM, to prohibit wideband operations on a going forward basis. Such a proposed mandate will eliminate the ability for local public safety agencies and Regional Planning Committees to opt for a cost effective high speed data solution that meets public safety requirements, especially for those agencies in lower population and/or large jurisdictional areas.

The City of Fort Lauderdale also disagrees with the Commission's conclusion that providing such flexibility could hinder efforts to deploy a nationwide, interoperable broadband network.

Interoperability can be achieved without the Commission mandating a single broadband technology and limiting the spectrum to only a nationwide network. Today, public safety agencies throughout Florida are achieving mission critical voice communications interoperability across disparate technologies. Similarly, there are a number of ways to achieve interoperability among wideband and various broadband technologies, both at the network connectivity level and the radio-to-radio level. These include network gateways, mobile routers, multi-mode radios and

inexpensive PCMCIA cards that can support the yet to be selected broadband network standard as well as other wideband and/or broadband technologies.

With the proposed nationwide broadband network roll out timetable of 8 to 10 years, public safety agencies will likely have to wait from 3 to 4 years from the yet to be determined start date in high population areas, while agencies in less populated areas may be required to wait a significantly longer time for the carrier to provide network coverage that may or may not meet their jurisdictional needs. And even then, there will be agencies in low population and rural areas that may never receive carrier broadband coverage. Under the Commission's tentative conclusion, by February 17, 2009, TV broadcasters are required to vacate all 700 MHz public safety spectrum. This spectrum will likely remain idle in many areas until such nationwide broadband network build out is completed. In the mean time, public safety needs access to high-speed data solutions in their jurisdictional area today. It becomes obvious that public safety requires local and/or regional 700 MHz data solutions, in addition to a nationwide broadband network, throughout the scheduled build out period, and to provide coverage capability in the remaining land areas beyond these build out plans. Local and regional networks can provide much needed high-speed data services until such time as a nationwide carrier network provides the jurisdictional coverage and applications needed by local agencies.

The City of Fort Lauderdale therefore urges the Commission to allow public safety agencies and Regional Planning Committees to make local/regional decisions on the 700 MHz public safety data spectrum, which give them the flexibility to deploy high-speed data solutions that best meet their budget and operational requirements. Public safety must have a choice, whether that choice is to deploy a local or regional network using either broadband or wideband

technology, or to wait for a nationwide broadband network to meet their high-speed data requirements.

Respectfully submitted,

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May 23, 2007